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Attorneys for Mark D. Waldron, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, Inc., a Washington
corporation,

Debtor.

Case No. 18-03197 FPC 11

The Honorable Frederick P. Corbit

Chapter 7

MARK D. WALDRON, as Chapter 7
Trustee,

Plaintiff,

vs.

Adv. Case No. 20-80031

**TRUSTEE'S MOTION TO
AMEND COMPLAINT AND
NOTICE**

PERKINS COIE LLP, a Washington
limited liability partnership,
LOWELL NESS, individual and
California resident, GIGA WATT
PTE., LTD., a Singapore corporation,
and ANDREY KUZENNY, individual
and Russian citizen,

Defendants,

- and -

THE GIGA WATT PROJECT, a
partnership,

Nominal Defendant.

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1 Mark D. Waldron, in his capacity as the duly appointed Chapter 7 Trustee,
2 by and through his attorneys, the Potomac Law Group PLLC, hereby moves for
3 entry of an Order, substantially in the form attached hereto as **Exhibit 1**, granting
4 the Trustee permission to file his First Amended Complaint, a copy of which is
5 attached hereto as **Exhibit 2**, pursuant to Rule 15 of the Federal Rules of Civil
6 Procedure, applicable hereto by Rule 7015 of the Federal Rules of Bankruptcy
7 Procedure. The Motion is supported by the *Memorandum of Points and*
8 *Authorities in Support of Trustee's Motion to Amend Complaint* and the
9 *Declaration of Pamela M. Egan in Support of Trustee's Motion to Amend*
10 *Complaint*, filed herewith.

11 Wherefore, the Plaintiff respectfully requests that the Court grant the
12 Motion, enter the proposed Order attached hereto as **Exhibit 1**, and grant such
13 other and further relief as the Court deems necessary and just.

14 NOTICE

15 If you wish to object to the foregoing Motion, an objection must be filed
16 with the Court and served upon undersigned counsel by October 17, 2022. The
17 Court may enter an Order without actual hearing or further notice unless a
18 written objection is timely served and filed.

19 Dated: September 26, 2022

POTOMAC LAW GROUP PLLC

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21 By: s/ Pamela M. Egan
22 Pamela M. Egan (WSBA No. 54736)
Attorneys for Mark D. Waldron, Chapter 7
Trustee, Plaintiff

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24 AMEND COMPLAINT AND NOTICE – Page 2